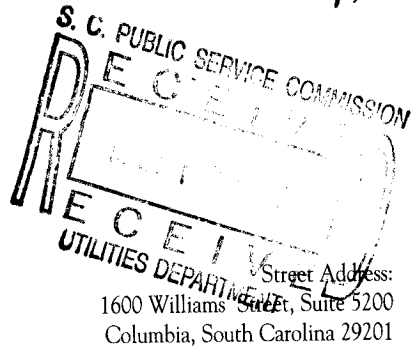




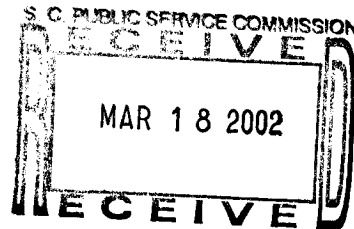
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Caroline N. Watson
General Counsel - South Carolina



March 18, 2002

The Honorable Gary E. Walsh
Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211



Re: Application of BellSouth Telecommunications, Inc. to
Provide In-Region InterLATA Services Pursuant to
Section 271 of the Telecommunications Act of 1996
Docket No. 2001-209-C

Dear Mr. Walsh:

Enclosed please find for filing an original and 15 copies
of BellSouth's Response to Motion for Reconsideration of AT&T,
WorldCom and SECCA. By copy of this letter, I am serving all
parties of record with a copy of this pleading as indicated on
the attached Certificate of Service.

Sincerely,

Caroline N. Watson

CNW/nml
Enclosure
cc: All Parties of Record

POSTED
11/3/99-02

ACCEPTED
Legal *John* 3/19/02

BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2001-209-C

Application of BellSouth Telecommunications,)
Inc. To Provide In-Region InterLATA)
Services Pursuant to Section 271 of the)
Telecommunications Act of 1996)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO MOTION
FOR RECONSIDERATION OF AT&T, WORLDCOM, AND SECCA**

BellSouth Telecommunications, Inc. ("BellSouth") hereby responds to the Motion
for Reconsideration of AT&T, WorldCom and SECCA and states as follows:

This Motion for Reconsideration should be denied on the grounds that it has no basis in fact. In essence, the CLECs have asked this Commission to reconsider its decision in this docket based not on some deficiency in the record before the Commission, but rather based on a speculative (and overstated) view of the FCC's conclusions in BellSouth's initial Georgia/Louisiana Application. This is not a valid ground for reconsideration of a Commission Order.

The main fallacy in the CLECs' argument is that BellSouth's initial filing with the FCC was "deficient." Contrary to the CLECs' representations, the FCC and BellSouth did *not* "decide" that BellSouth could not meet the checklist. To the contrary, there were five areas in which the FCC expressed interest in further information. While BellSouth's application with the FCC established a prima facie case that BellSouth has complied with the requirements of Section 271, as the FCC case progressed, there were five issues raised by CLECs that BellSouth wanted to address in the official record so that the issues

could be considered fully prior to the FCC issuing a decision on the application. BellSouth provided the requested information to the FCC in its February 14, 2002 filing.

The five issues on which BellSouth has provided the FCC with information are integration; service order accuracy; change control; data reliability and double FOC. BellSouth addressed each of these topics, to the extent it was raised by the CLECs, during this Commission's proceeding. For example, with respect to integration, BellSouth demonstrated that it provides CLECs with a TAG pre-ordering interface that is capable of interacting on an integrated basis with its TAG and EDI ordering interfaces on a machine-to-machine basis. Moreover, BellSouth demonstrated that CLECs have the ability to parse the CSR using the TAG pre-ordering interface to the same level that BellSouth has for itself. No CLEC controverted the evidence that BellSouth's interfaces can be integrated. BellSouth also presented the KPMG Third Party Test during which KPMG parsed CSR information during its functional test and automatically populated orders with pre-ordering information. KPMG's test demonstrated that KPMG, acting as a CLEC, successfully integrated pre-ordering, ordering and backend systems. In addition to all of this evidence, the Commission ordered BellSouth to provide CLECs with parsed CSR capabilities no later than BellSouth's long distance application being approved by the FCC.

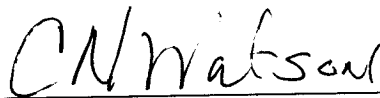
With respect to service order accuracy, BellSouth presented its performance data as well as extensive testimony demonstrating that BellSouth's performance and its process for handling manual orders is efficient and accurate. On change control, BellSouth demonstrated that it has an effective and active change control process the format of which incorporates the input of the participants. On data reliability, BellSouth

demonstrated that the Commission can rely on BellSouth's data for several reasons: BellSouth has extensive internal validation processes; KPMG has conducted two audits of BellSouth's data in Georgia and is in the process of conducting a third audit; and BellSouth provides CLECs with their CLEC-specific data to allow them to validate the data. In addition, BellSouth explained each of the alleged "reliability" issues raised by the CLECs. Finally, no CLEC specifically raised the issue of double FOCs in this proceeding; BellSouth did demonstrate, however, that BellSouth provides CLECs with due data capability for both resale services and UNEs.

Thus, BellSouth fully addressed with this Commission each of the topics on which it has provided further information to the FCC. The fact that there are additional facts demonstrating BellSouth's compliance with the Act today in no way means that the Commission needs to revisit its correct conclusion that BellSouth was in compliance with the checklist in South Carolina in late 2001. For these reasons, BellSouth respectfully requests that the Commission deny the Motion for Reconsideration.

This 18th day of March, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

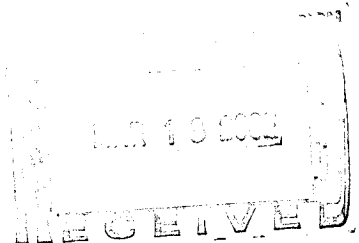
A handwritten signature in cursive script, reading "CN Watson", written over a horizontal line.

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The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth's Response to Motion for Reconsideration of AT&T, WorldCcom, and SECCA in Docket No. 2001-209-C, to be served by the method indicated below upon the following this March 18, 2002:

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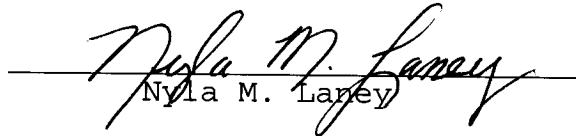
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